



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 9, 2025

By ECF

The Honorable Katharine H. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *International Refugee Assistance Project, Inc. v. United States Citizenship and Immigration Services, et al.*, No. 23 Civ. 1236 (KHP)

Dear Judge Parker:

This Office represents Defendants United States Citizenship and Immigration Services (“USCIS”) and the Department of State (“State,” and together with USCIS, the “Government”) in the above-referenced Freedom of Information Act (“FOIA”) action. We write jointly with Plaintiff International Refugee Assistance Project, Inc. (“IRAP”) in response to the Court’s order to file a joint status report on the eighth day of each month, or if that date is a weekend or public holiday, then on the following Monday.

This matter concerns FOIA requests IRAP submitted to State and USCIS. The USCIS request seeks records for case management software systems used or accessed by USCIS to process a refugee for resettlement to the United States through the U.S. Refugee Admissions Program. The State request seeks the same records with respect to State (“Part One” of the State request), as well as anonymized data from individual refugee cases (“Part Two” of the State request).

With respect to USCIS, as we have noted in previous status reports, USCIS made a release of identified responsive records in July 2023. In recent months, the parties have been discussing whether it is necessary for USCIS to run additional searches. IRAP has made a request for additional searches. Since the last status report, USCIS has responded with a specific proposal and IRAP has asked the agency to provide additional information so it can evaluate the proposal. The parties continue to discuss these issues in an effort to determine whether they can be resolved without litigation.

With respect to Part One of the State request, State is continuing to process records it located in its search. State made its seventeenth production of records responsive to Part One of the State request on May 1, 2025, and it anticipates making its eighteenth production of such records by June 13, 2025. State anticipates that it will complete productions by this September. As State’s processing nears completion, IRAP is reviewing State’s productions to determine whether it has any questions about the agency’s asserted exemptions. If so, the parties plan to discuss such issues between themselves to determine if they can be resolved without litigation.

With respect to Part Two of the State request, as we noted in our last status report, State produced data via CD mailed to IRAP on May 6, 2025. IRAP is continuing to review this production.

The parties thank the Court for its consideration of this joint status report and will file their next joint status report by July 8, 2025. If any issue becomes ripe for summary judgment motion practice in the meantime, the party seeking to file the motion will request a pre-motion conference with the Court.

Respectfully,

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: /s/ Peter Aronoff
PETER ARONOFF
ALYSSA B. O’GALLAGHER
Assistant United States Attorneys
Tel.: (212) 637-2697/2822
Email: Peter.Aronoff@usdoj.gov
Alyssa.O’Gallagher@usdoj.gov